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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

MONICA HINOSTROZA,

Plaintiff,

vs.

DENNY'S INC., d/b/a DENNY'S  
RESTAURANT, a Foreign Corporation;  
DOES 1 through 20; ROE BUSINESS  
ENTITIES 1 through 20, inclusive jointly and  
severally,

Defendants.

CASE NO.: 2:17-cv-02561-RFB-NJK

**JOINT INTERIM STATUS REPORT**

Under the Court's Order entered on March 29, 2018 and LR 26-3, the parties through their counsel of record submit this Joint Interim Status Report.

**I. Discovery Completed to Date**

- Denny's Inc. exchanged FRCP 26(a) disclosures on November 9, 2017.
- Plaintiff exchanged FRCP 26(a) disclosures on November 15, 2017.
- Denny's Inc. propounded its first set of written discovery on Plaintiff on November 9, 2017.
- Plaintiff propounded written discovery on Denny's Inc. on December 6, 2017.
- Plaintiff requested a site inspection and outlined his proposed FRCP 30(b)(6) topics

to Denny's Inc. 's counsel.

- Denny's Inc. and Plaintiff have been diligently requesting Plaintiff's medical records.
- The parties stipulated on December 27, 2017 to continue discovery.
- Plaintiff responded to Denny's Inc.'s first set of written discovery on January 19, 2018.
- Denny's Inc. responded to Plaintiff's first set of written discovery on February 13, 2018.
- On February 6, 2018, the parties stipulated to allow a site inspection of the Subject Property on March 1, 2018.
- On February 14, 2018, Denny's Inc. proposed its proposed stipulation for a protective order and confidentiality agreement.
- On February 15, 2018, Denny's Inc. disclosed its First Supplemental Supplement to its Rule 26(a) disclosures. This included 739 pages of documents.
- On February 26, 2018, Plaintiffs' counsel reported her injury to defense counsel and the parties agreed to continue discovery to accommodate counsel's injuries.
- On February 28, 2018, Denny's Inc. propounded its Second Set of Request for Production of Documents.
- On May 9, 2018, Plaintiff's expert conducted a site inspection.
- On June 15, 2018, Denny's Inc. took the deposition of Yovanni Suasnabar.
- On July 2, 2018, Denny's Inc. took the deposition of Jose Pereira.
- On July 18, 2018, Denny's Inc. took the deposition of the Plaintiff.
- On July 19, 2018, Denny's Inc. conducted an IME of the Plaintiff.
- On July 19, 2018, Denny's Inc. took the deposition of Maria Beccerra.
- On July 20, 2018, Denny's Inc. took a no-show deposition of Katia Moreno.
- On July 20, Denny's Inc. took a no-show deposition of Starlin Burgos.

## II. Discovery to be Completed

- Depositions of any medical providers.

- Depositions of experts.
- Depositions of any other percipient witnesses.
- Any other written discovery the parties deem necessary.

### III. Trial Estimate

The parties estimate needing seven to fifteen days to complete the trial. Kym S. Cushing for Plaintiff Monica Hinostroza and Riley A. Clayton and Troy Clark for Defendant Denny's Inc. will try the case.

### IV. Miscellaneous

The parties discussed but decline holding the trial before the magistrate judge and using the Short Trial Program. The parties are considering mediation using a private mediator or settlement conference through the Court.

Dated:

Dated:

**Richard Harris Law Firm**

**Hall Jaffe Clayton**

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